#### STATE OF ALASKA

#### REGULATORY COMMISSION OF ALASKA

Before Commissioners:	Keith Kurber II, Chairman Robert A. Doyle John Espindola Robert M. Pickett Janis W. Wilson
In the Matter of the Joint Petition Filed by the ALASKA EXCHANGE CARRIERS ASSOCIATION, INC., ALASCOM, INC., d/b/a AT&T ALASKA, and GENERAL COMMUNICATION CORP., d/b/a GENERAL COMMUNICATION, INC., and GCI for Approval of Stipulation Regarding Intrastate Access Charge Rates and Waiver of Manual Provisions	U-23-001

# ALASKA INTRASTATE INTEREXCHANGE ACCESS <u>CHARGE COMPLIANCE FILING FOR 2024</u>

Alaska Exchange Carriers Association, Inc. (AECA), through its counsel, Brena, Bell & Walker, P.C., pursuant to Order 2 issued in this docket, hereby makes the compliance filing contemplated by the Stipulation Regarding Access Charges ("Stipulation")<sup>2</sup> accepted by Order 2.<sup>3</sup> Specifically, AECA provides the following-described documents and information:

& WALKER, P.C. 810 N STREET, SUITE 100 ANCHORAGE, AK 99501 PHONE: (907) 258-2000 FAX: (907) 258-2001

Order Accepting Stipulation, Granting Requests for Waiver, Waiving Requirements, Approving Tariff Sheets, Requiring Filing, and Redesignating Commission Panel, Order U-23-001(2), June 30, 2023 (Order 2).

Stipulation Regarding 2023 and 2024 Access Charges, ¶ 4.a, at 11.

Order 2 at 9.

AECA's annual budget for the calendar year 2024, attached hereto as 1. Attachment 1:

Calculations in the form of Exhibit C, page 1, to the Stipulation, with the portions 2. of that Exhibit related to "Revenue Requirement AECA Administration" completed using AECA's calendar year 2024 information, attached hereto as Attachment 2, page 1; and

3. Calculations in the form of Exhibit C, Schedule IV, to the Stipulation, utilizing AECA's calendar year 2024 information, as well as information relative to other sources of revenue anticipated by AECA for 2024, attached hereto as Attachment 2, page 2.

In accordance with the foregoing, AECA has calculated the 2024 access charge rate per unit (to be effective from the period July 1, 2024, through June 30, 2025), to be .13 percent lower than the 2023 access charge rate per unit presently in effect.<sup>4</sup> Therefore, the decrease from 2023 to 2024 access charge rate per unit does not exceed the stipulated threshold of an increase of 0.5 percent, and in accordance with the Stipulation, "shall be considered a compliance filing establishing 2024 Access Charges."5

WALKER, P.C. ANCHORAGE, AK 99501 PHONE: (907) 258-2000 FAX: (907) 258-2001

See Attachment 2 at 1 (last line marked "% Change").

Stipulation at 11-12. Such established 2024 access charges are subject to further revision in accordance with the Stipulation,  $\P$  4.c, at 12-13.

## DATED this 13th day of October, 2023.

BRENA, BELL & WALKER, P.C. Counsel for Alaska Exchange Carriers Association, Inc.

 $By_{\underline{}}$ 

Robin O. Brena, AK Bar No. 8410089

Anthony S. Guerriero, AK Bar No. 8509123

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BRENA, BELL & WALKER, P.C. 810 N STREET, SUITE 100 ANCHORAGE, AK 99501 PHONE: (907) 258-2000 FAX: (907) 258-2001

#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2023, I served a true and correct copy of the foregoing document by electronic means as authorized by the Commission upon the following:

#### ALASCOM, Inc., d/b/a AT&T ALASKA

Anna Kapetanakos, Esq., AVP-Senior Legal Counsel

E-mail:

ak6252@att.com

#### General Communication Corp., d/b/a General Communication, Inc., d/b/a GCI

James R. Jackson, Jr., Esq., Regulatory Attorney

E-mail:

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### **ACS Long Distance, LLC**

Leonard A. Steinberg, Esq., General Counsel

E-mail:

leonard.steinberg@acsalaska.com

Lisa Phillips, Regulatory Affairs

E-mail:

Lisa.Phillips@acsalaska.com

By

Mindy Seay

BRENA, BELL & WALKER, P.C. 810 N STREET, SUITE 100 ANCHORAGE, AK 99501 PHONE: (907) 258-2000 FAX: (907) 258-2001

# Attachment 1 AECA's annual budget for the calendar year 2024

KDD	EXHIBIT -1	

1				
			1	
2024	2023	UNDER	Change	EXPLANATION OF ESTIMATE
1	1	1	l	
\$ 234,434	S 247.518	S 13.084	-5.29%	Actual labor with merit raises budgeted on anniversary dates, one-time 6.725% CPI adjustment was paid for 2022 in 2023, no CPI adjustment in 2024
	20,364		-4.68%	Limit Increase in Base ESC, FICA, MED
1		1		SEP-12%- Medical at monthly rate of average \$1,667 Per EE, actual coverage is based on litered percent coverage, increase is
88,132	83,053		6.12%	due to an estimated insurance election for previous vacancy in the 2023 budget.
1,183	1,183	\$ -	0.00%	Clerical Support, 40 hrs @ \$29hr.
	l			Rate 01/01/24-0/31/24 is @2.56 sq. ft per lease and lease will end August 2024, Office will transition to remote and budget includes the estimated expense for a flex office or conference room rental. Storage unit contract expired in 3/2022 and includes estimated
25 001	33 633	\$ 7642	-22 72%	the estimated expense for a flex office or conference room rental. Storage unit contract expired in 3/2022 and includes estimated
				Annual CABS Workshop estimate using 2022 actual amounts, 2023 workshop will be held virtually.
		Š .		Professional Development and Training.
-,	_,	ľ		Includes Travel Expense for Annual Meeting in Sitka, EE mileage and for 2 EE to attend the ATA Conference, ED to attend ATA
9,588				Whiter Conference.
999	690	\$ (309	44.79%	Annualized actual for most recent 12 months Plus 2% Inc. Increase due to purchase of desk and check stock.
3,472	2,018	\$ (1,454)	72.05%	Upgrade software applications, increase due to QuickBooks annual subscription increases and cloud storage.
5 470	4 740			Annualized actual 2023 rates, plus 2% increase, increase due to internet expense moved from Equipment Maintenance budget line
5,412	4,/13	\$ (198	16.11%	item,
410	447	e 27	-8 20%	Actual 2023 annualized postage expenses, plus a 2% increase in postage and contingency, includes post office box rental for August through December. Decrease due to discontinuance of postage subscription service.
				Includes cost to host the annual meeting, NTCA membership fee for EE benefits and business license.
1,020	1,020	1	10.00%	Present contracts with equipment and computer services support. Decrease due to internet expense moved to telephone budget
17,253	18,449	\$ 1,196	-6.48%	and item.
7,246	9,615	\$ 2,369	-24.64%	Actual 2023/2024 Premiums plus a 5% increase. Decrease due to restructuring of insurance policy.
				Financial audit of the essoc & prep. of tax forms. The review of the Dist account is not being completed in 2024 for 2023. The
21,000	18,650	\$ (2,350)	12.60%	account will be reviewed in 2025.
21,000	20,000	\$ (1,000	5.00%	Legal fees projection based on average services, legal monitoring, access charge stipulation and one access charge proceeding."
730				Bank fees per monthly estimate from new bank.
2,724	2,469	\$ (255)	10.33%	Legal notice for 39 meetings plus 2% increase, 2 major tariff flings and 4 other miscellaneous advertisements.
'			1	
				Includes the purchase of a new laptop and printer.
\$ 400,803	\$ 4/8,930	\$ 12,128	-2.53%	
_	_		0.00%	Annual Address and the second of the second
1		-	0.00%	Assumes out of town members will attend all meetings via teleconference.
_'	1 -	s -	0.00%	Assumes out of town members will attend all meetings via teleconference.
		\$ -	0	
	,	]	1	7
(\$9,000)	-	\$ (9,000)	N/A	Projected interest on CD investments. Previously not included in budget calculation.
			7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	
	\$ 478,930	\$ 21,127	-4,41%	LEGAL SPLIT: AO-25%, AP-75%
~4.41%	•	1		· ·
1		1	1	
(80 000)		1	1	Serve 2004 Start Aligna Charles
(60,000)	(62,000)	.l	ł	From 2024 filed AUSAC budget From 2023 filed AUSAC budget
	(62,000)	1	1	From 2023 filed AOSAC guaget
397.803	416.930			₹
227,000	,,,,,,,	<b> </b>	<del>                                     </del>	1
(138,659)				2024 Projection
(1,633)				MPL is directly billed to the NonPooling Companies
	(145,322)	ol .		2023
	(1,725)	1	<b></b>	MPL is directly billed to the NonPooling Companies
(140,292)	(147,047)	4		_
		4		
	L\$ 269.883		l	_
-4.58%				
	19,411  88,132 1,183 25,991 1,642 2,000 9,588 999 3,472 5,472 410 1,323 17,253 7,246 21,000 21,000 7300 2,724 2,793 \$ 466,803 (\$9,000) \$ 457,803 -4.41% (\$0,000) 397,803 (138,859) (1,833)	\$ 234,434 \$ 247,518 \$ 19,411 20,364 \$ 88,132 83,053 1,183 1,183 1,183 25,991 33,833 1,642 1,868 2,000 2,000 9,588 999 690 3,472 2,018 5,472 4,713 410 447 1,323 1,529 17,253 18,449 7,246 9,615 21,000 20,000 730 1,160 2,724 2,489 2,783 620 \$ 466,803 \$ 478,930 4,41% (\$9,000) \$ \$ 457,803 \$ 478,930 4,69,000 \$ \$ 457,803 \$ 478,930 4,69,000 \$ \$ 457,803 \$ 478,930 4,69,000 \$ \$ 457,803 \$ 478,930 4,69,000 \$ \$ 457,803 \$ 478,930 4,69,000 \$ \$ 457,803 \$ 478,930 \$ 416,	\$ 234,434 \$ 247,518 \$ 13,084 \$ 19,411 \$ 20,364 \$ 953 \$ 88,132 \$ 83,053 \$ 5,079 \$ 1,183 \$ 1,183 \$ 25,991 \$ 33,833 \$ 7,642 \$ 1,642 \$ 1,868 \$ 226 \$ 2,000 \$ 2,000 \$ 2,000 \$ 3,472 \$ 2,018 \$ (1,454) \$ 5,472 \$ 4,713 \$ (759) \$ 410 \$ 447 \$ 37 \$ 1,323 \$ 1,529 \$ 206 \$ 17,253 \$ 18,449 \$ 1,196 \$ 7,246 \$ 9,615 \$ 2,369 \$ 21,000 \$ 2,000 \$ (1,000) \$ 730 \$ 1,150 \$ 430 \$ 2,724 \$ 2,489 \$ (255) \$ 2,793 \$ 620 \$ (2,174) \$ 466,803 \$ 478,930 \$ 12,128 \$ - \$ \$ - \$ \$ - \$ \$ - \$ \$ - \$ \$ - \$ \$ - \$ \$ \$ - \$ \$ \$ - \$ \$ \$ - \$ \$ \$ - \$ \$ \$ - \$ \$ \$ - \$ \$ \$ - \$ \$ \$ \$ \$ (89,000) \$ (92,000) \$ \$ (1,633) \$ (145,322) \$	\$ 234,434 \$ 247,518 \$ 13,084 -5.29%   \$ 234,434 \$ 247,518 \$ 13,084 -5.29%   \$ 88,132   83,053 \$ (5,079)   \$ 1,183   1,183 \$ - 0.00%   \$ 1,183   1,183 \$ - 0.00%   \$ 25,991   33,833 \$ 7,642 -22.72%   \$ 1,642   1,868 \$ 226 -12.08%   \$ 2,000   2,000 \$ - 0.00%   \$ 9,588   8,953 \$ (835)   7,10%   \$ 999   690 \$ (309)   44.79%   \$ 3,472   2,018 \$ (1,454)   72.05%   \$ 5,472   4,713 \$ (759)   16.11%   \$ 410   447 \$ 37 -8.29%   \$ 1,323   1,529 \$ 206 -13.50%   \$ 17,253   18,449 \$ 1,196   -5.48%   \$ 7,246   9,615 \$ 2,369 -24.64%   \$ 21,000   18,650 \$ (2,350)   12,60%   \$ 21,000   20,000 \$ (1,000)   5.00%   \$ 730   1,160 \$ 430 -37.07%   \$ 2,724   2,469 \$ (255)   10,33%   \$ 2,724   2,469 \$ (255)   10,33%   \$ 2,783   620 \$ (2,174)   350.85%   \$ 466,803 \$ 478,930 \$ 21,127   -4,41%   \$ 457,803 \$ 478,930 \$ 21,127   -4,41%   \$ 441%   (60,000)   \$ (62,000)   (62,000)   \$ 397,803   416,930   \$ 21,127   -4,41%   \$ (60,000)   (62,000)   \$ 397,803   416,930   \$ 21,127   -4,41%   \$ (60,000)   (62,000)   \$ 5 257,511 \$ 269,883

F, ACCOUNTGIBUDGET/2024/AECA 2024 Budget Final

2024

Attachment 2

Calculations

Alaska Exchange Carriers Association Exhibit C - 2024 Stipulated Rates 10/13/2023

				T.1.1-	Orig Toll Free 7/1/2021 These rates are no lorger calculated through the access charge								
Revenue Requirements: Orders U-08-083(5) and 085(5), U-09-081(6), U-09-082 (5), 083(5), 085-	8(5) and U-10-062(5)	and 063(5).		Total Orig	Incl Toll Free		n-Toll Free	process per F0	CC 51.909(n)(2)	07/01/2013 These rates are not applicable.			
				ORIG LOCAL	ORIG	ORIG Non-Toll Free LOCAL	Free INFORMATION	ORIG Toll Free	INFORMATION	TERM	TERM		
POOLED RATE COMPUTATION SUMMARY	CCL	Total LOCAL SWITCHING	Total INFORMATION SURCHARGE	SWITCHING (48.80% of Total)	INFORMATION SURCHARGE (48.80% of Total)	SWITCHING (66.39% of Total Orig)	SURCHARGE (66.39% of Total Orig)		SURCHARGE (33.61% of Tota Orig)	LOCAL SWITCHING (51.20% of Total)	INFORMATION SURCHARGE	TOTAL DEDICATED TRANSPORT	TOTAL POOL F
Cost Company Revenue Requirement Including DEM (Schedule II)	\$5,996,409	\$3,058,076	\$44,502	\$1,492,341	\$21,717	\$990,765		\$501,576	\$7.299	\$1,565,735	\$22.785	\$1,273,019	REQUIREMEN
% Distribution	57 8133%	29.4839%		.,,,,,,,,,	42.0.	, ,,,,,,,	\$14,410	4001,070	47,233	\$1,000,750	\$22,765	12.2737%	\$10,372,0
Weighted DEM Support (Schedule III)													
Summit (CCL DEM adjustment refer to filed Part 69)	\$4,446	(\$30,463)	\$0	(\$14,866)	\$0	(\$9,870)		(\$4,996)	\$0	(\$15,597)	\$0	\$13,152	(\$12,8
United KUC	\$0	(\$297,107)		(\$144,988)	\$0	(\$96,258)		(\$48,730)			\$0	\$0	(\$297,1
United Utilities	\$0	(\$1,039,141)	\$0	(\$507,101)	\$0	(\$336,664)		(\$170,437)				\$0	(\$1,039,1
Subtotal Weighted DEM Support Removed From Access	\$4,446	(\$1,366,711)	\$0	(\$666,955)	\$0	(\$442,792)	\$0	(\$224,163)	\$0	(\$699,756)	\$0	\$13,152	(\$1,349,1
Cost Company Revenue Requirement Excluding DEM (Schedule I)	\$6,000,855	\$1,691,365	\$44,502	\$825,386	\$21,717	\$547,973	\$14,418	\$277,413	\$7,299	\$865,979	\$22,785	\$1,286,171	\$9,022,8
% Distribution	66.5070%	18.7452%	0.4932%									14.2546%	100.000
Average Schedule Companies Allocated Rev. Req.	\$106,186	\$29,929	\$787	\$14,605	\$384	\$9,696	\$255	\$4,909	\$129	\$15,324	\$403	\$22,760	\$159,6
Subtotal Cost & Avg. Sch.	\$6,107,041	\$1,721,294	\$45,289	\$839,991	\$22,101	\$557,669	\$14,673	\$282,322	\$7,428	\$881,303	\$23,188	\$1,308,931	\$9,182,5
% Distribution	66.5070%	18.7453%	0.4932%									14.2545%	100.000
Revenue Requirement AECA Administration (Schedule IV)	\$264,567	\$74,569	\$1,962	\$36,390	\$957	\$24,159	\$635	\$12,231	\$322	\$38,179	\$1.005	\$56.704	\$397.8
Reduce by Estimated Rev. Requirement Collection from Non Pooling LECs	(\$93,307)	(\$26,299)	(\$692)	(\$12,834)	(\$338)	(\$8,520)		(\$4,314)	(\$114	(\$13,465)	(\$354)	(\$19,998)	(\$140.2
Subtotal Revenue Requirement AECA Administration (Less Collections)	\$171,260	\$48,270	\$1,270	\$23,556	\$619	\$15,639	\$411	\$7,917	\$208	\$24,714	\$651	\$36,706	\$257,5
Subtotal Pooled Revenue Requirement	\$6,278,301	\$1,769,564	\$46,559	\$863,547	\$22,720	\$573,308	\$15,084	\$290,239	\$7,636	\$906,017	\$23,839	\$1,345,637	\$9,440,0
Total Pooled Revenue Requirements	\$6,278,301	\$1,769,564	\$46,559	\$863,547	\$22,720	\$573,308	\$15,084	\$290,239	\$7,636	\$906,017	\$23,839	\$1,345,637	\$9,440,0
% Distribution	66.5070%	18.7452%	0.4932%	9.1477%	0.2407%	6.0731%	0.1598%	3.0745%	0.0809%	9.5976%	0.2525%	14 2546%	100.000
FILED DEMAND	Months		Total LS Minutes	Orig LS Minutes	Orig Per 100 Minutes	Orig Non-Toll Free LS Minutes	Orig Non-Toll Free Per 100 Minutes	Orig LS Minutes	Orig Per 100 Minutes	Term LS Minutes	Term Per 100 Minutes	Total Dedicated Troks	
Actual Demand Period: December 20, 2011 through December 19, 2012 (Stipulated in 2018)	12		47,089,755	22,979,903	229,799	15,256,358	152 564	7.723.545	77.235	24.109.852	241.099	N/A	
Percent O/T Access Minutes Used to Divide LSW Rev. Req.				48.8000%		66,3900%		33.6100%	,===	51,2000%	211,000	1907	
				Orig Local	Orig Info		Orig Non-Toll Free	Composite Orig	inating Toll Free	Term Local	Term info		
Estimated Rate Calculation	CCL			Switching	Surcharge	Local Switching	Info Surcharge			Switching	Surcharge		
Estimated 2024 Rate per Unit*	\$523,192				I/A	\$0.037578	\$0.098870	N	/A	N/A	N/A	N/A	
2023 Rate per Unit July 1, 2023 through June 30, 2024 (U-23-001)	\$523.878				I/A	\$0.037628	\$0.099001						
	\$523,878 (\$686)			<u> </u>	WA .		***************************************	, N	/A	N/A	N/A		
Estimated Change in rates for 2024	(\$686)					(\$0.000050)	(\$0.000131)	1					

Per FCC 20-143 51.309(o)(1), Effective 7/1/2023 Originating Toll Free intrastate rates are to be removed in accordance with bill-and-keep methodology. These rates are no longer calculated through the intrastate access charge calculation process

#### Alaska Exchange Carriers Association Exhibit C - 2024 Stipulated Rates SCHEDULE IV Revenue Requirement AECA Administration

Per Order U06-136(16)/U-07-52(10)/U-07-100(8)/U-07-150)6)/U-08-32(5)/U-08-41(3)/U-08-43(3)/

U-08-44	(6\/LI	-08-4	and I	1-06-11	4

U-08-44(6)/U-08-4	and U-06-114			
# of				
Companies	COMPANY NAME			TOTAL
	Pooling Companies			
	AEE - ADAK			
_	ATC			
-	Bettles			
•	BBTC			
-	Bush-Tell			
-	Circle			
	North Country			
	Nushagak			
	OTZ			
	Summit			
	United KUC			
	United Utilities			
13	Yukon			
	Total # of Pooling Companies			1;
	Non-Pooling Companies			
14	ASTAC			
15	CVTC			
16	Cordova			
17	Interior - TelAlaska			
18	KPU			
19	MTA			
20	Mukluk-TelAlaska			
	Total # of Non-Pooling Companies			
	Total # of Companies Sharing AECA's Administrative Cost	(A)		20
		(5)		157.000
	AECA's Total Approved Revenue Requirement	(B)	\$	457,803
	Less: Estimated Reimbursement from Contract Services - AUSAC - TA-42-998	(C)	1	(60,000
	Less: Non Pooling Direct Assigned MPL Insurance	(D)		(1,633
	Total Revenue Requirement Less AUSAC Administrative Fee & NP DA = (E=B+C+D)	(E)	\$	396,170
	Total Revenue Requirement to be Recovered per Company = (F=E/A)	(F)	\$	19,809
	Estimated Revenue Requirement Collection from Non Pooling LECs = (G=F*7)	(G)		(138,663
	Total Estimated Revenue Requirement Collection from Non Pooling LECs = (H=D+G)			(140,296
	Net Revenue Requirement AECA Administration = (I=B+C+H)	(1)	\$	257,507